125 SUMMER STREET BOSTON MA 02110-1618

T 617 443 9292 F 617 443 0004 WWW.BROMSUN.COM

BROMBERG ✶ SUNSTEIN LLP

LISA M FLEMING
T 617 443 9292 x248
LFLEMING@BROMSUN.COM

January 27, 2005

VIA ELECTRONIC and FIRST CLASS MAIL

Sarah Chapin Columbia, Esq.
Choate, Hall & Stewart
53 State Street
Boston, Massachusetts 02109-2804

Re   *ScanSoft, Inc. v. Voice Signal Technologies, Inc. et al.*
      U.S.D.C. D. Mass. Civil Action No. 04-10353 PBS
      Our File   2639/509

Dear Sarah:

In the light of Judge Saris' Order of January 26, 2005, denying VST's Motion to Dismiss the trade secrets and 93A claims, and Magistrate Judge Alexander's Order requiring production of source code, I write to arrange for the immediate exchange of the parties' source code and propose Friday, January 28 as the day for the exchange. In accordance with the Magistrate Judge's Order, VST must produce source code for its speech recognition products including VSuite.

On a related matter, we note that VST has recently announced the development of a software product for use in Samsung cellular telephones. We believe the VST software described in the attached press release may either employ ScanSoft's trade secrets or infringe ScanSoft's '966 patent, or both. Pursuant to ScanSoft's Interrogatory Nos. 3 and 6, we renew our demand (as stated in my September 17, 2004 letter to Paul Popeo) for information concerning the sale, license or transfer of each VST speech recognition product, including the newly-announced software product, and the identification of those individuals with knowledge about the products, and remind you of VST's obligation to immediately supplement its discovery responses in this regard. VST's failure to supplement those responses will leave ScanSoft with no choice but to file a motion to compel.

Please let me know immediately whether January 28 is an acceptable date for the mutual exchange of source code and when I can expect VST's supplemental responses to interrogatories.

ATTORNEYS AT LAW

Sarah Chapin Columbia, Esq.
Choate Hall & Stewart
January 27, 2005
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Very truly yours,

Lisa M. Fleming

LMF/

Enclosure

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